

**IN THE UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF MISSISSIPPI
Jackson Division**

**MISSISSIPPI ASSOCIATION OF
EDUCATORS, BARBARA PHILLIPS,
JAMES THOMAS, DAWN ZIMMERER,
L.E. JIBOL, UNITED CAMPUS
WORKERS SOUTHEAST LOCAL 3821,
MADISYN DONLEY, ALEXIS COBBS,
KAREN ADERER, FOSTERING
LGBTQ+ ADVOCACY, RESOURCES,
ENVIRONMENTS AND WOMEN IN
SCIENCE AND ENGINEERING,**

Civil No. 3:25cv00417-HTW-LGI

Plaintiffs,

v.

**BOARD OF TRUSTEES OF STATE
INSTITUTIONS OF HIGHER
LEARNING, MISSISSIPPI
COMMUNITY COLLEGE BOARD,
MISSISSIPPI STATE BOARD OF
EDUCATION, MISSISSIPPI CHARTER
SCHOOL AUTHORIZER BOARD,**

Defendants.

**PLAINTIFFS' MOTION FOR TEMPORARY
RESTRAINING ORDER AND PRELIMINARY INJUNCTION**

The Plaintiffs move for a preliminary injunction prohibiting enforcement of the free speech bans contained in Sections 3(b), 3(f), 3(g), and 3(i) of House Bill 1193 of the Mississippi legislative session of 2025. This injunction will preserve the status quo pending resolution of the merits of this case. They also move for a temporary restraining order prohibiting enforcement of those sections in order to preserve the status quo while the Court considers and resolves the

preliminary injunction motion. The grounds for this motion are set forth in the memorandum that is being filed in support of it.

In support of this Motion, the following exhibits are attached:

1. **Exhibit 1:** WISE Declaration
2. **Exhibit 2:** Barbara Phillips Declaration
3. **Exhibit 5:** D'Andra Orey Declaration
4. **Exhibit 6:** Cliff Johnson Declaration
5. **Exhibit 7:** Jaime Harker Declaration
6. **Exhibit 8:** James Thomas Declaration
7. **Exhibit 9:** L.E. JiBol Declaration
8. **Exhibit 10:** Cliff Boler Declaration
9. **Exhibit 11:** Madisyn Donley Declaration
10. **Exhibit 12:** Alexis Cobbs Declaration
11. **Exhibit 13:** FLARE Declaration
12. **Exhibit 14:** Dawn Zimmerer Declaration
13. **Exhibit 15:** MAE Member B Declaration
14. **Exhibit 16:** HB 1193

Dated: June 18, 2025

Respectfully submitted,

<p><u>S/ ROBERT B. MCDUFF</u> ROBERT B. MCDUFF MS BAR No. 2532 PALOMA WU MS BAR No. 105464 MISSISSIPPI CENTER FOR JUSTICE 210 E. CAPITOL STREET, STE 1800 JACKSON, MS 39201 601-259-8484 RMCDUFF@MSCENTERFORJUSTICE.ORG PWU@MSCENTERFORJUSTICE.ORG</p> <p><u>S/ AMIR BADAT</u> AMIR BADAT MS BAR No. 106599 BADAT LEGAL PLLC P.O. Box 15 TOUGALOO, MS 39174 PHONE: 601-462-9592 AMIR.BADAT@GMAIL.COM</p> <p><i>COUNSEL FOR PLAINTIFFS</i></p>	<p><u>S/ JOSHUA TOM</u> JOSHUA TOM MS BAR. No 105392 McKENNA RANEY MS BAR No. 106330 AYANNA HILL MS BAR No. 106590 AMERICAN CIVIL LIBERTIES UNION OF MISSISSIPPI FOUNDATION, INC. P.O. Box 2242 JACKSON, MS 39225 PHONE: (601) 354-3408 JTOM@ACLU-MS.ORG MRANEY@ACLU-MS.ORG AHILL1@ACLU-MS.ORG</p>
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CERTIFICATE OF SERVICE

I certify that the foregoing has been filed on the ECF system which served all counsel of record on this 18th day of June, 2025.

s/ Joshua Tom

Joshua Tom

Co-counsel for Plaintiffs